



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

|  |   |                             |
|--|---|-----------------------------|
| In re Patent Application of:             | ) |                             |
|  | ) |                             |
| Bart Kavanaugh                           | ) |                             |
|  | ) | Confirmation No.: 5823      |
| Application No.: 09/986,670              | ) |                             |
|  | ) | Group Art Unit: 3624        |
| Filed: November 9, 2001                  | ) |                             |
|  | ) | Examiner: Geoffrey R. Akers |
| Title: System for Funding, Analyzing and | ) |                             |
| Managing Life Insurance Policies         | ) |                             |
| Funded with Annuities                    | ) |                             |

RESPONSE TO NON-COMPLIANT AMENDMENT UNDER 37 CFR 1.121

MS Non-Fee Amendment  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**RECEIVED**  
APR 13 2004  
**GROUP 3600**

Dear Sir:

In response to the Notice of Non-Compliant Amendment dated March 11, 2004, please reconsider the above-identified U.S. patent application in view of the Amendment submitted March 3, 2004 and the following remarks:

A full listing of claims begins on page 2 of this paper.

Remarks begin on page 6 of this paper.